

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

SUPPLEMENTAL FEE APPLICATION COVER SHEET FOR THE PERIOD FROM
JULY 1, 2022 THROUGH JULY 30, 2022

REGARDING McCARTER & ENGLISH, LLP'S SERVICES IN THE
NEW JERSEY MESOTHELIOMA TALC-RELATED LITIGATION¹

Debtor: LTL Management LLC

Applicant: McCarter & English, LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition Date")

SECTION 1
FEE SUMMARY

☐ Supplemental Monthly

or ☐ Final Fee Application

Fee Statement No. 4 – **Invoice 20220831**

Summary of Amounts Requested for the Period from July 1, 2022 through July 31, 2022
(the "Fourth Supplemental Statement Period").

Total Fees Owed by LTL:	\$5,138.75
Total Disbursements Owed by LTL:	\$0.00
Total Fees Plus Disbursements:	\$5,138.75
Minus 20% Holdback of Fees:	\$1,027.75
Amount Sought at this Time:	\$4,111.00

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested to LTL:	\$84,800.60	\$3,691.55
Total Fees Allowed to Date:	\$0	\$0
Total Retainer (If Applicable):	\$0	\$0
Total Holdback (If Applicable):	\$16,960.12	\$0
Total Received by Applicant:	\$38,697.12	\$3,631.49

¹ Pursuant to the *Order Amending Retention of McCarter & English LLP, Effective as of October 14, 2021* [Dkt. No. 2350], McCarter's services were expanded to include legal services with respect to representation of the Debtor in the Mesothelioma Cases, as defined in the *Application to Amend Retention of McCarter & English LLP, Effective as of October 14, 2021* [Dkt. No. 2273]. All fees and expenses that are the subject of this Fourth Supplemental Monthly Fee Statement relate only to expenses incurred or services provided in connection with the Mesothelioma Cases, for which McCarter has not previously sought payment.

Name of Professional & Title	Year Admitted	Hours²	Rate (discounted from standard)	Fees
John C. Garde, Esq., Partner	1986	5.1	\$650	\$3,315.00
Robert A. Mintz, Esq., Partner	1984	1.1	\$805	\$885.50
David J. Adler, Esq., Partner	1991	1.1	\$805	\$885.50
Penelope M. Taylor, Esq., Partner	1987	0.7	\$650	\$455.00
Brenda C. Sherman, Paralegal		4.2	\$265	\$1,113.00
		12.2		\$6,654.00

² The hours and respective fees indicated in this chart include amounts charged to Johnson & Johnson given McCarter & English, LLP's joint representation of the Debtor and Johnson & Johnson in the Mesothelioma Cases and are further detailed in the invoices attached hereto as Exhibit B.

**SECTION II
SUMMARY OF SERVICES³**

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition: Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.		
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.		
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	4.2	\$2,669.50
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.		
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).		

³ The hours and respective fees indicated in this chart include amounts charged to Johnson & Johnson given McCarter & English, LLP's joint representation of the Debtor and Johnson & Johnson in the Mesothelioma Cases and are further detailed in the invoices attached hereto as Exhibit B.

SERVICES RENDERED	HOURS	FEES
l) Meetings of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.		
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	8	\$3,984.50
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.		
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation: Appraise or review appraisals of assets.		
w) Travel Time: Please note that non-working travel time must be billed at 50% of cost.		
SERVICE TOTALS	12.2	\$6,654.00

**SECTION IV
CASE HISTORY**

1. Date of Retention: October 14, 2021, Amended May 23, 2022, effective as of the Petition Date [Dkt. 2350] (the “Retention Order”).⁴
2. Summary explaining the nature of the work performed and the results achieved:⁵

During the Fourth Supplemental Statement Period, McCarter & English professionals and paraprofessionals performed the following work, in connection with the Mesothelioma Cases, on behalf of the Debtor:

- Interacted with the judges of the Superior Court of New Jersey and the United States District Court for the District of New Jersey.
- Attended to matters related to the status of the dockets in the Superior Court of New Jersey and the United States District Court for the District of New Jersey.
- Preparation of application for retention as Special Counsel including conferring with the United States Trustee and counsel for estate and creditors regarding retention.

I certify under penalty of perjury that the above is true.

Date: August 31, 2022

/s/ John C. Garde
John C. Garde

⁴ The Amended Retention Order is attached hereto as Exhibit A.

⁵ The summary set forth below is qualified in its entirety by reference to the time and services detail in the invoices attached hereto as Exhibit B.